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February 14, 2014

California Coastal Commission
c/o Sea-Level Rise Work Group
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Attention: Hilary Papendick and Leslie Ewing

Re: Draft Sea-Level Rise Policy Guidance Document

Dear Mmes. Papendick and Ewing,

The Gaviota Coast, located in southern Santa Barbara County, includes the coastal watersheds between Coal Oil Point in Goleta, to Point Arguello on Vandenberg Air Force Base, and the remainder of Vandenberg's coast to Point Sal. The portion down-coast of Point Conception constitutes about 15% of Southern California's coast, yet contains approximately 50% of its remaining rural coastline. The Gaviota Coast Conservancy (GCC) is dedicated to long-term strategies to permanently protect and preserve this beautiful and irreplaceable national treasure. Our primary goals include:

- Conserve undeveloped land on the Gaviota Coast, including all undeveloped shoreline parcels between Coal Oil Point and Gaviota.
- Develop a long-term preservation strategy utilizing multiple and diverse management techniques.
- Maximize broad-based community support.
- Recognize private land ownership as one of the key components of the preservation strategy.
- Protect and enhance biological diversity.
- Maintain agricultural land in agricultural use.
- Protect and interpret the region's cultural heritage.
- Enhance public use, enjoyment, and appreciation through education and interpretation of the Gaviota Coast's resources.
- Provide appropriate recreational opportunities.
- Preserve and enhance the scenic quality of the region.
- Promote legislation and policy to further these goals.

GCC offers the following brief comments in support of the Commission's development and implementation of the principles and policies contained in the Sea-Level Rise guidance.

The resources at risk from sea level rise on the Gaviota Coast include natural resources such as beaches, estuaries and streams that will be threatened by increased flooding and inundation with associated impacts to already endangered or threatened species such as the southern steelhead Distinct Population Segment; tidewater goby,

and California red-legged frog in addition to numerous sensitive marine species. The region supports a unique array of rich and complex associations of plant species, vegetation types that are characteristic of coastal California, as well as those that are unique to the region. The many landforms of varying ages, origins, and composition; the geographic location; the regional, local, seasonal, and changing climatic conditions; and the land use history together contribute to the formation of a large number of habitats, many of which could be affected directly and indirectly by sea level rise impacts. In addition, erosion rates of the coastal bluffs will increase, leading to increased unpredictable episodic failures. Agriculture could be affected by saltwater intrusion into wells. Oil and gas facilities and infrastructure will be exposed, as well as the Union Pacific RR and potentially US Highway 101.

GCC firmly believes that in the coming years, for the public agencies struggling to deal with unstable conditions and unpredictable events, the best opportunities for reducing, minimizing or even possibly avoiding the worst impacts, will be provided by undeveloped lands such as those along the Gaviota Coast that will allow the maximum amount of flexibility in adapting. Built environments will potentially require more expensive protection or more radical adaptive strategies than natural ones.

Therefore, areas such as the Gaviota Coast should be made a first priority for acquisitions, conservation easements and other open space protections. Developments in vulnerable areas, such as areas close to the shoreline, should be discouraged unless they can be shown to be resilient to increased water levels, such as floating structures, and not require new protective structures.

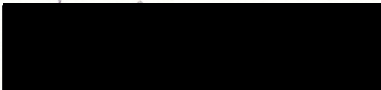
The guidance document states a goal of reducing the impacts of sea level rise on coastal resources. GCC believes that this goal should be expanded to include mitigating or minimizing impacts, as well as adapting to impacts that cannot be reduced.

GCC strongly supports the goals of adaptive, science-based decision-making. We also support the development of a TDR program for areas such as the Gaviota Coast for incorporation into the County of Santa Barbara Local Coastal Program (LCP).

We look forward to the guidance document and grant programs providing the incentive to Santa Barbara County to update its LCP in accordance with current, science-based projections of sea level rise.

Thank you for the opportunity to comment.

Yours Very Truly,



Phil McKenna
President